Received by NSD/FARA Registration Unit 12/03/2019 5:29:34 PM OMB No. 1124-0001; Expires May 31, 2020

### U.S. Department of Justice

Washington, DC 20530

# Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

IREGISTRANT
1. Name of Registrant
ITBC LLC
2. Registration Number (To be assigned by the FARA Unit)
6762
3. Primary Business Address 1629 Reisterstown Road, Suite 350, Pikesville, MD 21208
4. If the registrant is an individual, furnish the following information:
(a) Residence address(es)
${ m N/A}$
(b) Nationality N/A
(c) Year of birth N/A
(d) Present citizenship N/A
(e) If present citizenship not acquired by birth, state when, where and how acquired
(f) Occupation N/A
5. If the registrant is not an individual, furnish the following information:
(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐ Corporation ☑ Other (specify) N/A
(b) Date and place of organization 05/08/2018, Maryland
(c) Name of responsible individual Sergel Krasnitski
(e.g., officer, director or partner)
(d) Other business address(es), if any, including N/A locations of branch or local offices
locations of branch of local offices
(a) If a mean hamilia amounization, amounida mumban af meanshana N/A
(e) If a membership organization, provide number of members N/A

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UPA	UL	4,

10	т : 11 .		- cc:	1:		c	41	C	- C	- cc:	. 1:	- C +1	
(I)	List all i	bartners.	officers.	directors of	r persons	periorm:	ing the	Tunctions	or an	officer of	airector	or the	registrant.

NameResidence Address(es)PositionNationalityMr. Sergel Krasnitski3473 Niner Road<br/>Finksburg, MD 21048Managing memberUNITED STATES

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name Foreign Pr Mr. Gergei Krasnitski Mr. Micha

Foreign Principal(s) Represented Services
Mr. Michael Sokolov The ind

The individual's sole activity was to hire, and coordinate the payments to, lobbying firms. The individual did not lobby, and his contacts with lobbying firms were limited to issues of

(h) Describe the nature of the registrant's regular business or activity.

IT and business consulting services

(i) Give a complete description of the ownership and control structure of the registrant.

Single-member LLC, wholly owned by Sergei Krasnitski

6. List all individuals, other than those listed in Item 5(g), who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name Residence Address Foreign Principal(s) Represented Services N/A N/A N/A N/A N/A

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### II--FOREIGN PRINCIPAL

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Pri	ncipal
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Mr. Michael Sokolov

Foreign Principal Address

Vynnychenko Street 4/6 Dnipro UKRAINE 49027

#### III--ACTIVITIES

	vities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging dering services on its own behalf which benefits any or all of its foreign principals?
Yes □	No 🗷
If yes, describe fully. $N/A$	

### IV--FINANCIAL INFORMATION

#### 9. (a) RECEIPTS-MONIES

During the period beginning 60 days prior to the date of your obligation to register <sup>2</sup> under FARA, did the registrant receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation on, or for disbursement, or otherwise?

Yes 
No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount
Mr. Michael Sokolov	07/09/2018	Michael Sckolov (Foreign Principal)	Fse	\$1,000.00
Mr. Michael Sokolov	09/12/2018	Michael Sokolov (Foreign Principal)	Fee	\$5,000.00
Mr. Michael Sokolov	11/14/2018	Michael Sokolov (Foreign Frincipal)	Fee	\$2,500.00
Mr. Michael Sokolov	02/12/2019	Michael Sekolov (Foreign Principal)	Foo	\$5,500.00

\$14,000.00

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

 $<sup>2\,</sup>$  An agent must register within  $10\,$  days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

(PAGE 4)

	During the pe	eign principal na	60 days prior to med in Item 7	anything of value5 oth			lid the registrant receive ation on, or for disbursement,			
	If yes, furnish the following information:									
	Foreign Princ	cipal	Date Received	d From Whom	Purpose N/A		Thing of Value $_{\mathbb{N}/\mathbb{A}}$			
10	( ) DIGDUD		NATE OF THE OWNER OWNER OF THE OWNER							
10.	During the pe	money in further	60 days prior to rance of or in o				lid the registrant spend or incipal named in Item 7?			
		th below in the r n foreign princip		and separately for eac	h such foreign pri	ncipal named in	cluding monies transmitted,			
	Foreign Princ	cipal Date	е То	Whom	Purpose See Append response	iix 10(a) for	Amount			
	During the pe any thing of v named in Item	value8 other than	60 days prior to n money in fur ss □	o the date of your obli			lid the registrant dispose of of any foreign principal			
	Foreign Princ	ipal	Date N/A	Recipient	Purpose N/A		Thing of Value			
	(c) DISRUR	SEMENTS_PO	LITICAL CO	ONTRIBUTIONS						
	During the pe short form res connection w	eriod beginning ( gistrant make an	50 days prior to y contribution o any political	o the date of your oblined of money or other this	ng of value from i	ts own funds an	lid the registrant or any d on its own behalf in ention, or caucus held to			
	If yes, furnish	n the following i	nformation:							
	Date N/A	Donor N/A	Politic N/A	al Organization/Candi	date Method		Amount/Thing of Value			

<sup>4, 6, 7</sup> and 9 See Footnote 2, on page 3. 5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

				10
V.	INFORMA	TIONAL.	MATERIAL	SI

informational materials on Yes ☐ No	nis statement, 11 did the registrant behalf of any foreign principal li	sted in Item 7 of this statement?	be disseminated, any
Foreign Principal	i principal and access the milotime	Informational Materials Attack	hed Type N/A
12. Will the activities of the rematerials?  Yes □ No		principal include the preparation	or dissemination of informational
_	HE REMAINING ITEMS IN TH	IS SECTION V.	
13. Identify each such foreign	principal.		
disseminating informations	n principal, and specify the period	No □	s activities in preparing or  Amount
dissemination of such info Yes ☐ No			articipate in the preparation or
If yes, furnish the names at Name	nd addresses of such individuals of Address  N/A	or organizations. Foreign Pi N/A	rincipal(s)
16. Activities in preparing or c	isseminating informational mate	rials will include the use of the f	following:
☐ Magazine or newspaper ☐ Lectures or speeches ☐ Email ☐ Website URL(s): N/A		☐ Press releases ☐ Motion picture films	☐ Pamphlets or other publications ☐ Letters or telegrams
☐ Social Media website URL ☐ Other (specify) N/A	(s): N/A		

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

<sup>11</sup> See Footnote 2, on page 3

17 If		41 - 6-11
	materials will be disseminated amor lic officials	ing the following groups.  □ Civic groups or associations
☐ Leg		☐ Libraries
_	ernment agencies	☐ Educational groups
	rspapers	☐ Nationality groups
☐ Edit	ors	Other (specify) N/A
18. Indicate lang	uage to be used in the informational	materials:
☐ Eng	lish	☐ Other (specify) N/A
	VIEXH	HIBITS AND ATTACHMENTS
19. (a) The follo	owing described exhibits shall be file	ed with an initial registration statement:
Exhibit A-	This exhibit, which is filed on Form foreign principal named in Item 6.	n NSD-3, sets forth the information required to be disclosed concerning each
Exhibit B-	This exhibit, which is filed on Form between the registrant and the foreign	n NSD-4, sets forth the information concerning the agreement or understanding gn principal.
the char the requ	ter, articles of incorporation, associative irement to file an Exhibit C may be o	This exhibit, for which no printed form is provided, consists of a true copy of tion, constitution, and bylaws of a registrant that is an organization. A waiver of obtained for good cause shown upon written application to the Assistant Attorne epartment of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
		This exhibit, for which no printed form is provided, sets forth an account of fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e))
		VIIEXECUTION
affirms under per	nalty of perjury that he/she has read t	he penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears of the information set forth in this Registration Statement, that he/she is familiar in their entirety true and accurate to the best of his/her knowledge and belief.
Date	Printed Nam	signature 12
12/03/2019	Sergei Krasnitski	/s/Serge: Krasnitski
		<del></del>

<sup>12</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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### **Registration Statement**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
12/3/2019	SERGEI KRASNITSKI	alle en

# Response to Item 10(a)

Question 10(a): DISBURSEMENTS-MONIES: During the period beginning 60 days prior to the date of your obligation to register under FARA, did the registrant spend or disburse any money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7? If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal

Foreign Principal	Date	To Whom	Purpose	Amount
Mr. Michael Sokolov	05/30/2018	Linden Strategies LLC	Consulting Fee	\$50,000.00
Mr. Michael Sokolov	07/02/2018	Linden Strategies LLC	Consulting Fee	\$50,000.00
Mr. Michael Sokolov	07/05/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	07/24/2018	Conjo Studios, LLC	Professional Services Fee	\$3,000.00
Mr. Michael Sokolov	07/30/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	07/31/2018	Linden Strategies LLC	Consulting Fee	\$50,000.00
Mr. Michael Sokolov	08/27/2018	Naomi Munson	Professional Services Fee	\$10,000.00
Mr. Michael Sokolov	08/28/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	09/04/2018	Naomi Munson	Professional Services Fee	\$5,000.00
Mr. Michael Sokolov	09/04/2018	Linden Strategies	Consulting Fee	\$50,000.00
Mr. Michael Sokolov	10/10/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	10/12/2018	Linden Strategies	Consulting Fee	\$49,970.00
Mr. Michael Sokolov	11/05/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	11/29/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	12/27/2018	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	01/28/2019	The Livingston Group LLC	Professional Services Fee	\$50,000.00
Mr. Michael Sokolov	02/01/2019	Conjo Studios, LLC	Professional Services Fee	\$2,500.00
Mr. Michael Sokolov	03/11/2019	The Livingston Group LLC	Professional Services Fee	\$50,000.00

## **Exhibit D - Fundraising Contributions**

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
VIZIENTAS PTE. LTD	160 Robinson Rd #16-04 SBF Center Singapore 068914	05/15/2018	\$52,500.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
VIZIENTAS PTE. LTD	160 Robinson Rd #16-04 SBF Center Singapore 068914	06/20/2018	\$50,000.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount	
VIZIENTAS PTE. LTD	160 Robinson Rd #16-04 SBF Center Singapore 068914	06/27/2018	\$50,000.00	

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
VIZIENTAS PTE. LTD	160 Robinson Rd #16-04 SBF Center Singapore 068914	07/13/2018	\$5,000.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
VIZIENTAS PTE. LTD	160 Robinson Rd #16-04 SBF Center	07/30/2018	\$102,500.00
	Singapore 068914		

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
VENUS COMMERCIAL S.R.O.	Kremenacova 90/6 Praque 10400	08/27/2018	\$100,000.00
	Czech Republic		

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

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Donor Name	Donor Address	Date Received	Amount
ALPHA TECH LLC	15504 85TH AVE E	08/31/2018	\$19,500.00
	:PUYALLUP WA, 98375	i i	

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
SMART LIGHT ADVISING LP	12 SOUTH BRIDGE SUITE 110	10/10/2018	\$51,727.00
	EDINBURGH EH1 1DD, UK		

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
BOSFOR INVESTMENT S.R.O.	Bilkova 855/19 Prague 110 00	10/10/2018	\$48,264.00
	Czech Republic		

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?
Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
MEGAPOLIS INVEST GROUP s.r.o.	Pod Habrovou 445/3	10/25/2018	\$49,992.00
	Prague 152 00 Czech Republic	1	

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
WELLSOFT EXPERTS LIMITED PARTNERSHIP	2323 - 32 Avenue N.E., Suite 260, Calgary, Alberta T2E 6Z3, Canada	11/15/2018	\$50,020.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
	2402 Antigua Cir UNIT 03 Coconut Creek, FL 33066	12/21/2018	\$49,986.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
	Units A-C, 25/F, Seabright Plaza No. 9-23 Shell Street North Point Hong Kong	01/23/2019	\$50,000.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

## Received by NSD/FARA Registration Unit 12/03/2019 5:29:34 PM

Donor Name	Donor Address	Date Received	Amount
BLUE PLANET TRADING SDN BHD	Suite 1705A, Level 17, Menara Landmark, 12 Jalan Ngee Heng, 80000 Johor, Malaysia	03/07/2019	\$50,000.00

Did the registrant collect or receive contributions, loans, money from a single donor contributing \$50 or more for the foreign principal as part of a fundraising campaign?

Yes

Receipts for Mr. Michael Sokolov:

Donor Name	Donor Address	Date Received	Amount
	Units A-C, 25/F, Seabright Plaza No. 9-23 Shell Street North Point Hong Kong	03/29/2019	\$30,000.00